

## CHAPTER 26

### ALTERNATIVE MONITORING FORMATS

- 26-1 APPLICABILITY. This Chapter provides CPD staff with two additional alternative formats designed to enhance monitoring efficiency and effectiveness. The two Exhibits in this Chapter are organized on a *project* basis in recognition that a significant part of monitoring involves review of a sample of specific projects. One Exhibit covers rehabilitation of multi-family rental housing funded from multiple CPD sources; the second Exhibit addresses Community Development Block Grant (CDBG)-funded public facilities. Project-based reviews, in contrast to program-based reviews, serve to evaluate whether a particular project is in compliance with a range of applicable requirements, as well as provide a test of the management and compliance systems being used by the program participant responsible for the project.

In addition to the alternative organization, the Exhibits in this Chapter have been designed to provide additional structure and uniformity in documenting the basis for each monitoring conclusion. The Exhibits includes guidance and formats that assist reviewers in identifying and recording the specific facts and data relied upon in responding to a particular review question. This re-emphasizes the importance of providing verifiable documentation to support each monitoring conclusion, whether such a conclusion is positive (compliance) or negative (noncompliance).

- 26-2 GUIDE FOR REVIEW OF MULTI-UNIT RENTAL HOUSING REHABILITATION. Increasingly, the financing of affordable rental housing projects involves the combination of funds from several CPD Programs (and other sources as well). Recognizing the practical difficulty reviewers face in having to refer to several separate Exhibits as they review such a project, this Exhibit brings together in one place, coverage of key, selected requirements from two CPD programs: CDBG and the Supportive Housing Program (SHP). (Note: For projects involving HOME Investments Partnership Program funds, reviewers must use Exhibit 7-6 in Chapter 7 of this Handbook to monitor compliance with HOME requirements.)

Within each section of this Exhibit, the reviewer can address a particular compliance aspect, such as eligibility and beneficiaries, from the perspective of each applicable program. This Exhibit covers only projects involving the rehabilitation of an existing structure, and omits new construction, since a review of new construction would add significant complexity, making the Exhibit unwieldy and difficult to use.

- 26-3 GUIDE FOR REVIEW OF PUBLIC FACILITY. This Exhibit is designed to review a CDBG-funded public facility activity, rather than a single compliance area or a broad system. Requirements for the compliance issues that typically apply to this type of activity are contained in this Exhibit.
- 26-4 REVISIONS AND ADDITIONS. CPD reviewers are encouraged to test the usefulness of these alternative monitoring formats and provide feedback, suggesting both improvements in the specific Exhibits included here as well as the desirability of developing additional Exhibits in a similar format (e.g., such as a separate Exhibit specifically for new construction of affordable housing).